

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
SOUTHERN DIVISION**

JONATHAN MANGAN, individually, and on  
behalf of all other persons similarly situated,

Plaintiffs,

vs.

CHRISTIAN COUNTY, MISSOURI, by and  
through its Board of County Commissioners, ROY  
MATTHEWS, TOM CHUDOMELKA, and  
BILL BARNETT, in their official capacities; and  
STEVE WHITNEY, Sheriff of Christian County, in  
his official capacity,

Defendants.

Case No. 99-3373-CV-S-AE-ECF

**DECLARATION OF PAUL W. REBEIN IN SUPPORT  
OF PLAINTIFFS' MOTION FOR ATTORNEY'S FEES AND EXPENSES**

I, Paul W. Rebein, pursuant to 28 U.S.C. § 1746, declare the following statement to  
be true and correct to the best of my knowledge:

1. I am lead counsel for Plaintiffs in the above-captioned case.
2. This Declaration is made based upon my personal knowledge.
3. I am a partner at the law firm of Shook, Hardy & Bacon, LLP. I work in the  
general litigation division of the firm. Part of my practice focuses on civil rights class action litigation.

4. I have reviewed the time billed in the above-captioned case by myself, Eddie Lorenzo, Holly Pauling and Kelli Curry. The underlying documents supporting these figures will be attached to this Declaration as Exhibit A.

5. The following chart illustrates the total fees and expenses incurred by Plaintiffs:

**MANGAN v. CHRISTIAN COUNTY**  
**Fees and Expenses from 1999 to February 3, 2000**

TIMEKEEPER	HOURLY RATE	TIME	FEES	EXPENSES	TOTAL
Paul W. Rebein	\$180.00	33.8 Hours	\$6,084.00	\$264.16 (Travel) 7.00 (Dinner)  Total: \$271.16	\$6,355.16
Eddie Lorenzo	\$150.00	80.7 Hours	\$12,105.00	\$150.00 (Filing fee) \$85.76 (Hotel) \$20.85 (Book)  Total: \$256.61	\$12,361.61
Holly Pauling	\$150.00	44.75 Hours	\$6,712.50	\$100.34 (Hotel)  Total: \$100.34	\$6,812.84
Kelli Curry	\$80.00	7.6 Hours	\$608.00	\$0	\$608.00
<b>TOTALS</b>		<b>166.85 Hours</b>	<b>\$25,509.50</b>	<b>\$628.11</b>	<b>\$26,137.61</b>

6. The following chart shows the total fees and expenses after a reduction in hourly rates pursuant to 42 U.S.C. §1997e:

**EXHIBIT B**  
**MANGAN v. CHRISTIAN COUNTY**  
**Fees and Expenses from 1999 to February 3, 2000**

<b>TIMEKEEPER</b>	<b>HOURLY RATE</b>	<b>TIME</b>	<b>FEES</b>	<b>EXPENSES</b>	<b>TOTAL</b>
Paul W. Rebein  (in court) (out of court)	 \$90.00 \$60.00	 1.0 Hours 32.8 Hours	\$ 90.00 \$1,968.00 Total: \$2058.00	\$264.16 (Travel) 7.00 (Dinner) Total: \$271.16	\$2,329.16
Eddie Lorenzo  (out of court)	 \$60.00	 80.7 Hours	 \$4,842.00 Total: \$4,842.00	\$150.00 (Filing fee) \$85.76 (Hotel) Total: \$256.61	\$5,098.61
Holly Pauling  (in court) (out of court)	 \$90.00 \$60.00	 1.0 Hours 43.75 Hours	\$90.00 \$2,625.00 Total: \$2,715.00	\$100.34 (Hotel) Total: \$100.34	\$2,815.34
Kelli Curry	\$40.00	7.6 Hours	\$304.00	\$0	\$304.00
<b>TOTALS</b>		<b>166.85 Hours</b>	<b>\$9,919.00</b>	<b>\$628.11</b>	<b>\$10,547.11</b>

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

\_\_\_\_\_  
Paul W. Rebein

Executed on February \_\_\_\_, 2000

**CERTIFICATE OF SERVICE**

I hereby certify that on this 17th day of February, 2000, I mailed, postage prepaid, a true and correct copy of the above and foregoing to:

Raymond E. Whiteaker  
WHITEAKER & WILSON, P.C.N  
1919 E. Battlefield, Suite B  
P.O. Box 3758  
Springfield, Missouri 65808-3758

Attorney for Defendants

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Attorney for Plaintiff